REMARKS

Claims 1-4, 6, 8, 10-15, 17, 20-26, 28, and 30-33 are pending. Claims 5, 7, 9, 16, 18-19, 27, and 29 were previously canceled without prejudice or disclaimer. Claims 1-2, 6, 12-15, 17, 20-26, 28, and 30-33 have been amended. No new matter has been added. Support for the amendments may be found in at least FIG. 1 and paragraph 0024 of the application. Applicant respectfully submits that the claims are in condition for allowance.

35 U.S.C. § 101

The Office has rejected claims 1-4, 6, 8, 10-15, 17, and 20-22, at paragraphs 5-8 of the Office Action, under 35 U.S.C. § 101. Applicant has amended claims 1-2, 12-15, 17, and 20-22 to comply with 35 USC § 101. Applicant respectfully requests withdrawal of the rejection of claims 1-4, 6, 8, 10-15, 17, and 20-22 under 35 U.S.C. § 101.

35 U.S.C. § 103

Claims 1, 6, 10-12, 20-23, and 30-33 are Allowable

The Office has rejected claims 1, 6, 10-12, 20-23, and 30-33, at paragraphs 9-16 of the Office Action, under 35 U.S.C. § 103, as being unpatentable over U.S. Publication No. 2003/00233292 ("Richey") in view of U.S. Patent No. 7,246,084 ("Javangula"). Applicant notes that paragraph 10 of the Office Action cites 35 U.S.C. § 102 (e). Applicant assumes that this is a typographical error because both the heading at page 4 of the Office Action and paragraph 9 cite 35 U.S.C. § 103. Applicant respectfully traverses the rejections.

Claims 1, 6, and 10-11

The cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest the specific combination of claim 1. For example, the cited portions of Richey fail to disclose or suggest determining a destination associated with a user-selectable link using an ontology, as in claim 1. In contrast to claim 1, Richey discloses a user system that permits a user or service subscriber to access an online dispute resolution system and use various types of services offered by an online dispute resolution system to resolve a credit card dispute. See Richey, paragraph 0021. In Richey, a cardholder may use a service provided by the online

dispute resolution system to report a disputed transaction. See Richey, paragraph 00025. The cited portions of Richey fail to disclose or suggest determining a destination associated with a user-selectable link using an <u>ontology</u>, as in claim 1. Accordingly, the cited portions of Richey fail to disclose or suggest at least one element of claim 1.

In further contrast to claim 1, Javangula discloses processing an electronic order that involves receiving, from a mobile customer device, first order data for an order that contains less than a minimum set of data required by a merchant to completely process the order and retrieving additional information required by the merchant to completely process the order. See Javangula, Abstract. In Javangula, second order data is generated based upon the first order data and the additional information. See Javangula, Abstract. Javangula further discloses that the second order data contains at least the minimum set of data required by the merchant to completely process the order. See Javangula, Abstract. The cited portions of Javangula fail to disclose or suggest determining a destination associated with a user-selectable link using an ontology, as in claim 1. Accordingly, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 1. Hence, claim 1 is allowable.

Claims 6 and 10-11 depend from claim 1, which Applicant has shown to be allowable. Accordingly, claims 6 and 10-11 are allowable, at least by virtue of their dependence from claim 1. In addition, the dependent claims contain additional elements not disclosed or suggested by the cited portions of Richey and Javangula.

For example, the cited portions of Richey and Javangula fail to disclose or suggest that multiple user-selectable links comprise a first link that facilitates communication with a human to address a first question type and a second link that facilitates machine-to-machine communication to address a second question type without requiring human intervention, as in claim 10. For at least this additional reason, claim 10 is allowable.

Claims 12 and 20-22

The cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest the specific combination of claim 12. For example, the cited portions of Richey and Javangula fail to disclose or suggest a rules-based machine-to-machine communication component including an ontology to facilitate routing of data to a destination based on a type of input from a consumer, as in claim 12. In contrast to claim 12, as discussed above, Richey discloses a user system that permits a user or service subscriber to access an online dispute resolution system and use various types of services offered by an online dispute resolution system to resolve a credit card dispute. See Richey, paragraph 0021. The cited portions of Richey fail to disclose or suggest a rules-based machine-to-machine communication component including an ontology to facilitate routing of data to a destination based on a type of input from a consumer, as in claim 12. Accordingly, the cited portions of Richey fail to disclose or suggest at least one element of claim 12.

In further contrast to claim 12, as discussed above, Javangula discloses processing an electronic order that involves receiving, from a mobile customer device, first order data for an order that contains less than a minimum set of data required by a merchant to completely process the order and retrieving additional information required by the merchant to completely process the order. See Javangula, Abstract. The cited portions of Javangula fail to disclose or suggest using an ontology, as in claim 12. Accordingly, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 12. Hence, claim 12 is allowable.

Claims 20-22 depend from claim 12, which Applicant has shown to be allowable. Accordingly, claims 20-22 are allowable, at least by virtue of their dependence from claim 12. In addition, the dependent claims contain additional elements not disclosed or suggested by the cited portions of Richey and Javangula.

For example, the cited portions of Richey and Javangula fail to disclose or suggest that multiple user-selectable links comprise a first link that facilitates communication with a human to address a first question type and a second link that facilitates machine-to-machine

communication to address a second question type without requiring human intervention, as in claim 21. For at least this additional reason, claim 21 is allowable.

Claims 23 and 30-33

The cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest the specific combination of claim 23. For example, the cited portions of Richey and Javangula fail to disclose or suggest identifying a destination associated with a user-selectable link using an ontology, as in claim 23. In contrast to claim 23, as discussed above, Richey discloses a user system that permits a user or service subscriber to access an online dispute resolution system and use various types of services offered by an online dispute resolution system to resolve a credit card dispute. See Richey, paragraph 0021. The cited portions of Richey fail to disclose or suggest identifying a destination associated with a user-selectable link using an ontology, as in claim 23. Accordingly, the cited portions of Richey fail to disclose or suggest at least one element of claim 23.

In further contrast to claim 23, as discussed above, Javangula discloses processing an electronic order that involves receiving, from a mobile customer device, first order data for an order that contains less than a minimum set of data required by a merchant to completely process the order and retrieving additional information required by the merchant to completely process the order. See Javangula, Abstract. The cited portions of Javangula fail to disclose or suggest identifying a destination associated with a user-selectable link using an ontology, as in claim 23. Accordingly, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 23. Hence, claim 23 is allowable.

Claims 30-33 depend from claim 23, which Applicant has shown to be allowable. Accordingly, claims 30-33 are allowable, at least by virtue of their dependence from claim 23. In addition, the dependent claims contain additional elements not disclosed or suggested by the cited portions of Richey and Javangula.

For example, the cited portions of Richey and Javangula fail to disclose or suggest that multiple user-selectable links comprise a plurality of electronic mail addresses, as in claim 30.

As another example, the cited portions of Richey and Javangula fail to disclose or suggest that multiple user-selectable links comprise a first link that facilitates communication with a human to address a first question type and a second link that facilitates machine-to-machine communication to address a second question type without requiring human intervention, as in claim 32. For at least these additional reasons, claims 30 and 32 are allowable.

Claims 2-3, 13-14, and 24 -25 are Allowable

The Office has rejected claims 2-3, 13-14, and 24-25, at paragraphs 17-18 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Richey and Javangula in view of U.S. Publication No. 2004/0236660 ("Thomas"). Applicant respectfully traverses the rejections.

Claims 2-3

Claims 2-3 depend from claim 1. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 1. The cited portions of Thomas fail to disclose or suggest those portions of claim 1 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 1, Thomas discloses a multiparty transaction system for managing payment of invoices where approval of multiple parties is involved. See Thomas, Abstract. Thomas further discloses that the system may permit the participation of third party beneficiaries and the management of invoices and payments by a third party intermediary among sellers, obligors, and beneficiaries. See Thomas, Abstract. The cited portions of Thomas fail to disclose or suggest determining a destination associated with a user-selectable link using an ontology, as in claim 1. Therefore, the cited portions of Richey, Javangula, and Thomas, individually or in combination, fail to disclose or suggest at least one element of claim 1. Accordingly, claims 2-3 are allowable, at least by virtue of their dependence from claim 1.

Claims 13-14

Claims 13-14 depend from claim 12. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 12. The cited portions of Thomas fail to disclose or suggest those portions of claim 12 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 12, as

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discussed above, Thomas discloses a multiparty transaction system for managing payment of invoices where approval of multiple parties is involved. See Thomas, Abstract. The cited portions of Thomas fail to disclose or suggest a rules-based machine-to-machine communication component including an ontology to facilitate routing of data to a destination based on a type of input from a consumer, as in claim 12. Therefore, the cited portions of Richey, Javangula, and Thomas, individually or in combination, fail to disclose or suggest at least one element of claim 12. Accordingly, claims 13-14 are allowable, at least by virtue of their dependence from claim 12.

Claims 24 and 25

Claims 24 and 25 depend from claim 23. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 23. The cited portions of Thomas fail to disclose or suggest those portions of claim 23 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 23, as discussed above, Thomas discloses a multiparty transaction system for managing payment of invoices where approval of multiple parties is involved. See Thomas, Abstract. The cited portions of Thomas fail to disclose or suggest identifying a destination associated with a user-selectable link using an ontology, as in claim 23. Therefore, the cited portions of Richey, Javangula, and Thomas, individually or in combination, fail to disclose or suggest at least one element of claim 23. Accordingly, claims 24-25 are allowable, at least by virtue of their dependence from claim 23.

Claims 4, 15 and 26 are Allowable

The Office has rejected claims 4, 15 and 26, at paragraphs 19-20 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Richey and Javangula in view of U.S. Publication No. 2003/0220843 ("Lam"). Applicant respectfully traverses the rejections.

Claim 4

Claim 4 depends from claim 1. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 1. The cited portions of Lam fail to disclose or suggest those portions of claim 1 not

disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 1, Lam discloses a method of facilitating resolution of a dispute between a buyer and a seller in an electronic payment system. See Lam, Abstract. In Lam, an invoice is received from the seller and is electronically routed to individuals in the buyer's organization. See Lam, Abstract. Lam further discloses that indications that the invoice is disputed, corrections to the invoice, comments for the seller regarding the invoice and comments for other individuals in the buyer's organization are received from a set of two or more individuals in the buyer's organization. See Lam, Abstract. The cited portions of Lam fail to disclose or suggest determining a destination associated with a user-selectable link using an ontology, as in claim 1. Therefore, the cited portions of Richey, Javangula, and Lam, individually or in combination, fail to disclose or suggest at least one element of claim 1. Accordingly, claim 4 is allowable, at least by virtue of its dependence from claim 1.

Claim 15

Claim 15 depends from claim 12. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 12. The cited portions of Lam fail to disclose or suggest those portions of claim 12 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 12, as discussed above, Lam discloses a method of facilitating resolution of a dispute between a buyer and a seller in an electronic payment system. See Lam, Abstract. The cited portions of Lam fail to disclose or suggest a rules-based machine-to-machine communication component including an ontology to facilitate routing of data to a destination based on a type of input from a consumer, as in claim 12. Therefore, the cited portions of Richey, Javangula, and Lam, individually or in combination, fail to disclose or suggest at least one element of claim 12. Accordingly, claim 15 is allowable, at least by virtue of its dependence from claim 12.

Claim 26

Claim 26 depends from claim 23, which Applicant has shown to be allowable. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 23. The cited portions of Lam fail to disclose or suggest those portions of claim 23 not disclosed or suggested by the cited portions of Richey

and Javangula. In contrast to claim 23, as discussed above, Lam discloses a method of facilitating resolution of a dispute between a buyer and a seller in an electronic payment system. See Lam, Abstract. The cited portions of Lam fail to disclose or suggest identifying a destination associated with a user-selectable link using an <u>ontology</u>, as in claim 23. Therefore, the cited portions of Richey, Javangula, and Lam, individually or in combination, fail to disclose or suggest at least one element of claim 23. Accordingly, claim 26 is allowable, at least by virtue of its dependence from claim 23.

Claim 8 is Allowable

The Office has rejected claim 8, at paragraphs 21-22 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Richey and Javangula in view of U.S. Publication No. 2003/0051226 ("Zimmer"). Applicant respectfully traverses the rejection.

Claim 8 depends from claim 1. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 1. The cited portions of Zimmer fail to disclose or suggest those portions of claim 1 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 1, Zimmer discloses that "an input device 216, such as a keyboard, a mouse, or a voice activated device can be used to input data and other commands into the processor 202 to facilitate in the generation of the file 30." See Zimmer, paragraph 0784. Zimmer further discloses that "display 214 could be touch sensitive for use as an input device 216." See Zimmer, paragraph 0784. The cited portions of Zimmer fail to disclose or suggest determining a destination associated with a user-selectable link using an ontology, as in claim 1. Therefore, the cited portions of Richey, Javangula, and Zimmer, individually or in combination, fail to disclose or suggest at least one element of claim 1. Accordingly, claim 8 is allowable, at least by virtue of its dependence from claim 1.

Claims 17 and 28 are Allowable

The Office has rejected claims 17 and 28, at paragraphs 23-24 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over Richey in view of Lam and U.S. Publication No. 2001/0023414 ("Kumar"). Applicant respectfully traverses the rejections.

Claim 17

Claim 17 depends from claim 12. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 12. The cited portions of Kumar fail to disclose or suggest those portions of claim 12 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 12, Kumar discloses an interactive drop-down menu containing a plurality of questions, the questions relating to various aspects of financial planning, an interactive inputs section containing a plurality of input data fields and selection boxes, the inputs section for configuring a calculative order, a submission function for submitting the calculative order upon completion thereof and a results window for displaying the data results derived from the calculations ordered. See Kumar, paragraph 0022. Kumar further discloses that a user operating within a user-interface selects an issue from a drop-down menu, populates any vacant data fields and or selection boxes displayed in the inputs section as a result of selecting an issue, and submits the data for server-side calculation and subsequent display of the calculated results. See Kumar, paragraph 0022. The cited portions of Kumar fail to disclose or suggest a rules-based machineto-machine communication component including an ontology to facilitate routing of data to a destination based on a type of input from a consumer, as in claim 12. Therefore, the cited portions of Richey, Javangula, and Kumar, individually or in combination, fail to disclose or suggest at least one element of claim 12. Accordingly, claim 17 is allowable, at least by virtue of its dependence from claim 12.

Claim 28

Claim 28 depends from claim 23. As discussed above, the cited portions of Richey and Javangula, individually or in combination, fail to disclose or suggest at least one element of claim 23. The cited portions of Kumar fail to disclose or suggest those portions of claim 23 not disclosed or suggested by the cited portions of Richey and Javangula. In contrast to claim 23, as discussed above, Kumar discloses that a user operating within a user-interface selects an issue from a drop-down menu, populates any vacant data fields and or selection boxes displayed in the inputs section as a result of selecting an issue, and submits the data for server-side calculation and subsequent display of the calculated results. See Kumar, paragraph 0022. The cited portions of Kumar fail to disclose or suggest identifying a destination associated with a user-selectable

link using an <u>ontology</u>, as in claim 23. Therefore, the cited portions of Richey, Javangula, and Kumar, individually or in combination, fail to disclose or suggest at least one element of claim 23. Accordingly, claim 28 is allowable, at least by virtue of its dependence from claim 23.

CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the cited portions of the references as applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the cited art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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